CONSTRUCTION STORMWATER GENERAL PERMIT INSPECTION REPORT

State of Washington Department of Ecology

Section A: General Data

Ecology Inspector(s): Carol Serdar Contaminated CSWGP Inspector Phone: 360.742.9751 Email: carolserdar@ecy.wa.gov	On-Site Representative Name: Thom Fischer Title: Electron Hydro LLC, permittee Additional Participants: Jess Eakens, ECY Sheila Marcoe, ECY Steve Goodrich, Electron Hydro	Inspection Date and Entry/Exit Time: 17 Aug 2020, 9:00/13:30	Inspection Type: Compliance Inspection
		Receiving waters: Puyallup River	Permit webpage: https://fortress.wa.gov/ecy/paris/FacilitySummary.aspx?FacilityId=70091

Section B: Background

Note: See Corrections Required Form

The Electron Hydro LLC Intake project is covered under the State of Washington's Construction Stormwater General Permit (CSWGP). The CSWGP is a National Pollutant Discharge Elimination System (NPDES) and a State Waste Discharge permit for discharge of construction-related stormwater. Carol Serdar had previously been to the site a few years' prior, during the JARPA review for the then proposed re-construction of the barrier dam and intake structure and on 11 August 2020 in response to ERTS699710.

Ecology personnel met at Electron Hydro main office at 9AM; then met with Electron Hydro representatives Thom Fischer and Steve Goodrich (CESCL). Thom provided maps of the construction area. Individuals then drove the Hancock forestland road to the site of the barrier dam and intake structure construction staging area.

Once at the staging area, we convened in the job office and reviewed paperwork. We discussed the site is permitted for a total of 30 acres with 4.5 acres of disturbance; currently more than 4.5 acres have been disturbed*. The expansion of the disturbed area into the already permitted total area, will require the permittee submit a CSWGP Modification Form for the total area to be disturbed over the lifetime of the permit. Site will adjust the disturbed area to match the total amount of expected disturbance over lifetime of the CSWGP. See Corrections Required for link to required form. The site log book was missing DMR reports and site inspection reports were not present from previous inspections, not keeping weekly site inspection reports is a violation of CSWGP condition S4.B.5.. Other CSWGP required paperwork was present. After the 11 August 2020 site visit, Steve had immediately begun using the weekly Site Inspection Report form found on Ecology's website with all 13 Elements; this was provided during this inspection. Carol requested Steve send electronic copies of the weekly site inspection report for the next two weeks**.

Discussed prioritization of reports and plans the site is currently developing; ERTS #699710 summary report had still not been submitted (based on CSWGP condition S5.F.)***.

Site map/SWPPP map with notes (BMP installations) was hanging on the wall of the job office. Discussed adding dates and initials of when the BMPs were installed or removed. Discussed updating SWPPP and SWPPP map with the mulch BMP that was currently being applied to the exposed and unworked soils within the staging area.

Discussed DMR monthly reports; reporting is up-to-date but did not account for upland discharges into construction area. Thom and Steve explained the sampling is tied into the required sampling for the in-water work (comparing upstream/background sample for turbidity and downstream sample). Downstream sample must not exceed 110% of background. Data for monitoring was present and sufficed for construction sampling to date. Carol requested the water quality monitoring plan (hard copy provided during inspection-dated 14Aug2020) and mentioned that the required sampling for the CSWGP and the in-water work might be able to be combined, based on the comingling of riverbed dewatering water with upland stormwater. Carol explained the required turbidity and/or pH sampling from other potential areas that would not discharge into the construction area of the riverbed would need additional monitoring if discharges occur; site intends to use a turbidity meter.

Weather at time of inspection: Sunny and 80s

Precipitation in the past 24 hours?
☐ Yes
☑ No

On site observations:

As a group we walked the upland staging area and discussed newly added mulch on side slopes.

Forms for concrete stairs have been constructed, concrete not able to be poured due to 6 August 2020 stop work orders (Pierce County and USACE). Discussed pH laden stormwater water management from concrete curing; if concrete is not poured during the dry period, large tanks or lined pond would need to be installed at base (near road parallel to Puyallup River).

Walked around the newly graded staging area and discussed slope discharges. The berms of wood slash at the base of the slope and adjacent to flat forested area appears to provide reasonable assurance as an adequate BMP; discussed adaptive management if not. Thom agreed that the CESCL would inspect the perimeter of the disturbed area for turbid discharges, including the area adjacent to the road that leads away from this newly sloped, flat staging area. If there is a discharge into the ditch along this forest road, it will be sampled for turbidity.

Area with 55 gallon drums identified on 11 August 2020 inspection had newly installed storage units for storage of chemicals and fuel.

Discussed concrete wash out area was appropriately lined, but must be contained until cured and the pH laden water to be managed according to the Stormwater Management Manual of Wester Washington (SWMMWW) – it may not be infiltrated unless it meets CSWGP benchmark (pH 6.5-8.5). No concrete wash has been discharged from the pond.

Sports turf was delivered to the area adjacent to the crane, Carol and Jess walked the area and did not observe any black rubber bits; left bank upstream of the crane had been graded and the rock berm adjacent to river was installed for water diversion of construction area. Parked along the road parallel to the Puyallup River at the barrier dam and intake structure.

Walked same direction as on 11 August 2020; beginning above the intake structure. Discussed exposed slope management. Exposed and unworked soil is **a violation of CSWGP condition S9.D.5.d.**. This area may be a challenge to temporarily stabilize based on proximity to active riverbed construction.

Generator for riverbed dewatering had a straw wattle surrounding it, but no plastic lining. All equipment with fuel must meet 110% capacity of the fuel tank; not having secondary containment is **a violation of CSWGP condition S9.D.9.b.**.

Stormwater management was explained; water from upland and dewatering water from the river construction area is comingled and enters the ditch between the base of the hillslope and the flume, comingled water flows into the sediment pond with the standpipe and rack on top, then into the stormwater ponds with three weirs (now constructed with siltfences, straw bales have been removed). Before discharge, water is sampled and if it is less than 110% of background sample, then the water may be discharged from the last stormwater pond into ditch with check dams to discharge into the Puyallup River. If water in the stormwater pond is greater than 110% of background sample, the water would be pumped from the stormwater pond to infiltrate into the adjacent forestland (visual monitoring would occur around the forested area)****. The stormwter system needed maintenance as soon as possible for additional stormwater capacity (CSWGP condition S9.D.3. and S9.D9.4.).

Post inspection:
**Carol roughly digitized disturbed area using Google Earth after the inspection on 11 August 2020*
***CESCL has provided weekly site inspection reports for three consecutive weeks*
****ERTS report (CSWGP condition S5.F.) was mistakenly submitted via Ecology's webportal then emailed to Carol on 28 August 2020*
*****The final Water Quality Monitoring Plan (WQMP) (dated 27Aug2020) was accepted by the USACE, and this system has been removed and WQMP now specifies infiltration into the forested area.*

Section C: Compliance
Note: See Corrections Required Form 8 September 2020

Inspection Checklist

Is the Permit Coverage Letter on-site? X Yes ☐ No	Is a copy of the CSWGP on-site? X Yes ☐ No	Is the Site Log Book Current? ☐ Yes X No	Is the Site Log Book Adequate? ☐ Yes X No
Are Site Inspections Recorded? X Yes ☐ No	Are Site Inspections Adequate? ☐ Yes X No	Permittee has Prepared and Implemented a SWPPP? X Yes ☐ No	Is the SWPPP Adequate? X Yes ☐ No

Violations and action required to achieve compliance	**Complete or submit date**	**Guidance**
SEE CORRECTIONS REQUIRED – dated 8 September 2020		

ADDITIONAL RESOURCES FOR COMPLIANCE:

For assistance with any of these compliance issues or recommendations regarding BMPs, please see the 2014 (or 2019) Stormwater Management Manual for Western Washington (SWMMWW), Volume II, Construction Stormwater Pollution Prevention which includes BMPs for Source Control and Runoff Conveyance and Treatment BMPs. The full SWMMWW is available at: http://www.ecy.wa.gov/programs/wq/stormwater/manual.html.

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to $10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

Noncompliance with the limits, monitoring requirements, terms and/or conditions established in your permit may result in formal enforcement action by the Department of Ecology.

Ecology Inspector (signature): Carol Serdar Date: 8 September 2020
Ecology Inspector (print name): Carol Serdar

Water Quality Program
Southwest Regional Office
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SWRO Tel: 360-407-6300

All photos taken by Carol Serdar

Photo 1
Photo Description: Thom provided maps for site visit; map from the plans dated 14 August 2020. Feature names on this map have changed since this inspection (Conveyance Channel from Work Area is now referred to Conveyance Ditch – refer to WQMP dated 27Aug2020 for most current feature names).

Photo 2
Photo Description: Parked adjacent to intake structure; discussed upland CSWGP area and BMPs to stabilize exposed and unworked soil.

Date:2020/08/17

Photo 3

Photo Description: Access/haul road on left bank of Puyallup River, bend is location where rolls of sports turf were delivered. Inspectors stopped and did not observe any black rubber bits. Streambed (left bank) upstream of crane has been modified for construction work.

Date:2020/08/17

Photo 4

Photo Description: Portion of sports turf under black liner was ripped away during headward erosion of streambed at lower section of channelized river, at the downstream end of the fish ladder (fish ladder at black plastic gap on bank across river).

Date:2020/08/17

Photo 5

Photo Description: Stormwater and dewatering water are comingled in ditch between base of slope and reconstruction of flume; conveyance ditch flows into a Sediment Pond.

Date:2020/08/17

Photo 6

Photo Description: Conveyance Ditch contains fines from Puyallup River dewatering water; discussed appropriate ditch management and cleaning schedule as soon as possible.

Date:2020/08/17

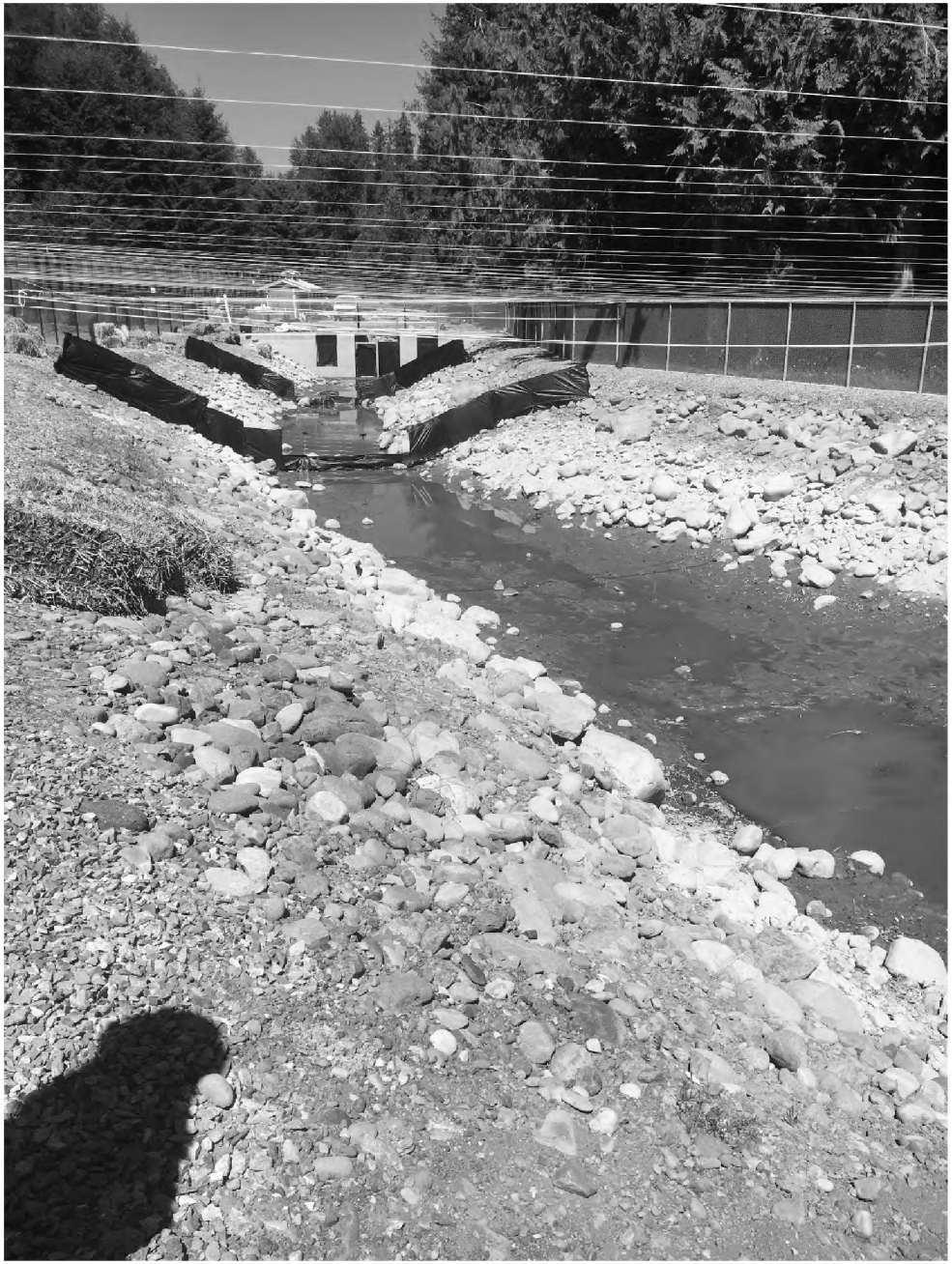
Photo 7

Photo Description: Sediment Pond has a standpipe and outlet structure (in shadow); discussed BMPs for additional settling out of fines and cleaning schedule.

Date:2020/08/17

Photo 8

Photo Description: Stormwater pond with checkdams settle out additional fines before last ditch (at far end of pond); discussed cleaning schedule and ability to overflow into forest to right of pond if turbidity is 110% or greater than background water sample.



Date:2020/08/17